

REMARKS

The claims have not been amended. Accordingly, claims 1-12 are pending in the application, of which claims 1 and 12 are independent.

Applicants request reconsideration and timely withdrawal of the rejections for at least the following reasons.

Finality Must be Withdrawn

Even if the examiner disagrees with Applicants' assertions of patentability below, the finality of this Office Action at least must be withdrawn in the next mailing from the USPTO. The examiner's rejections of claims 4-7 and 11 have not been updated from the previous Office Action, and are incomplete. Specifically, the examiner fails to address the new reliance upon Kuwahara in the rejection of claim 4-7 and 11 as noted below. For at least this reason, the Office Action's rejections of these claims are improper on its face, and the finality of this Office Action must be withdrawn.

Rejections Under 35 U.S.C. § 103

To establish an obviousness rejection under 35 U.S.C. § 103(a), four factual inquiries must be examined. The four factual inquiries include (a) determining the scope and contents of the prior art; (b) ascertaining the differences between the prior art and the claims in issue; (c) resolving the level of ordinary skill in the pertinent art; and (d) evaluating evidence of secondary consideration. *Graham v. John Deere*, 383 U.S. 1, 17-18 (1966). In view of these four factors, the analysis supporting a rejection under 35 U.S.C. 103(a) should be made explicit, and should "identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the [prior art] elements" in the manner claimed. *KSR Int'l. Co. v. Teleflex, Inc.*, 550 U.S. ___, slip op. at 14-15 (2007). Thus, even if the prior art may be combined, the references

when combined must disclose or suggest all of the claim limitations. *See in re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

Claims 1-3 and 8-10 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over U.S. Patent No. 6,262,699, issued to Suzuki, *et al.* ("Suzuki") in view of U.S. Patent No. 6,525,486, issued to Awamoto, *et al.* ("Awamoto"), further in view of U.S. Patent No. 6,496,164, issued to Kuwahara, *et al.* ("Kuwahara"). Applicants respectfully traverse this rejection for at least the following reasons.

Suzuki, Awamoto, and Kuwahara, even if combined, fail to disclose or suggest all of the features of claim 1. Claim 1 recites, *inter alia*:

wherein ... in a mixed address-display period, a first XY electrode pair group is addressed and sustain-discharged by a first driving circuit before a second XY electrode pair group is addressed by a second driving circuit.

Even if combined, Suzuki, Awamoto, and Kuwahara fail to disclose or suggest at least these features. As the examiner concedes on page 3 of the Office Action, Suzuki and Awamoto fail to disclose or suggest "a mixed address-display period." So the examiner turns to Kuwahara for this feature. Specifically, the examiner looks to Kuwahara's Figs. 6 and 7 to disclose that "a first XY electrode pair group is addressed and sustain-discharged by a first driving circuit before a second XY electrode pair group is addressed by a second driving circuit." But Applicants disagree that this occurs in "a mixed address-display period."

As shown in Kuwahara's Fig. 7, a frame is split into an odd field and an even field, which are separate from each other. In the odd field, each sub-field includes its own separate address period and its own separate sustain period. And in the even field, the same arrangement exists: namely, each sub-field includes its own separate address period and its own separate sustain

period. Because each of these periods is separate from the others, Applicants disagree that Kuwahara's Fig. 7 discloses "a mixed address-display period."

To the contrary, Kuwahara's Fig. 7 appears to disclose nothing more than a conventional interlaced driving scheme where the odd lines are reset, addressed, and sustain-discharged during a first half of a frame, and the even lines are reset, addressed, and sustain-discharged during a second half of the frame. This is not "a mixed address-display period." Without importing features of the specification into the claims, Applicants submit that the specification reveals at least one reasonable interpretation of "mixed address-display period," which is described as "a mixed period in which an address period and a mixed display-sustain period coexist." Specification, paragraph [0055]. Kuwahara fails to disclose this or anything else that falls within the broadest reasonable interpretation of "a mixed address-display period."

Moreover, Applicants traverse that Suzuki, Awamoto, and Kuwahara can be combined as suggested by the examiner. On one hand, the examiner suggests combining Suzuki and Awamoto to achieve "driving circuits commonly connected to a reset circuit" so that "it would ensure that the reset is applied to all of the electrodes at the same time." Office Action, page 3. However, as noted above, Kuwahara has distinct reset periods and does not apply a reset to all of the electrodes at the same time. Thus, not only do these three references, either alone or in combination, fail to disclose every feature of claim 1, but these references are incompatible and cannot be combined as suggested by the examiner.

For at least these reasons, claim 1 is allowable over Suzuki in view of Awamoto, further in view of Kuwahara.

Claim 12 stands rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Lee in view of Suzuki, in view of Awamoto, in further view of Kuwahara. Applicants respectfully traverse this rejection for at least the following reasons.

For at least the reasons asserted above with respect to claim 1, Suzuki in view of Awamoto, further in view of Kuwahara fail to disclose or suggest “a mixed address-display period.” Further, Lee discloses an address-display separation display method and an address-while-display driving method (see Lee, Fig. 3; Fig. 4), but also fails to disclose “a mixed address-display period.” Thus, Lee fails to disclose or suggest the shortcomings of Suzuki in view of Awamoto, further in view of Kuwahara.

For at least these reasons, claim 12 is allowable over Lee in view of Suzuki, in view of Awamoto, further in view of Kuwahara.

Claims 4-7 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Suzuki in view of Awamoto, further in view of U.S. Patent Application Publication No. 2003/0057858, applied for by Lee, *et al.* (“Lee”). Applicants respectfully traverse this rejection for at least the following reasons.

Applicants submit that claim 1 is allowable over Suzuki in view of Awamoto alone (and the examiner concurs. See Office Action, page 3). Lee fails to cure the deficiencies of Suzuki in view of Awamoto noted above with regard to claim 1. Hence, claims 4-7 are allowable at least because they depend from an allowable claim 1.

Claim 11 stands rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Suzuki in view of Awamoto, further in view of U.S. Patent No. 6,091,380 issued to Hashimoto, *et al.* (“Hashimoto”). Applicants respectfully traverse this rejection for at least the following reasons.

Applicants submit that claim 1 is allowable over Suzuki in view of Awamoto alone (and the examiner concurs. See Office Action, page 3). Hashimoto fails to cure the deficiencies of

Suzuki in view of Awamoto noted above with regard to claim 1. Hence, claim 11 is allowable at least because it depends from an allowable claim 1.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection of claims 1 and 12. Claims 2-11 depend from claim 1 and are allowable at least for this reason. Since none of the other prior art of record, whether taken alone or in any combination, discloses or suggests all the features of the claimed invention, Applicants respectfully submit that independent claims 1 and 12, and all the claims that depend therefrom, are allowable.

All Pending Claims are Allowable over the Art of Record

Since none of the other prior art of record discloses or suggests all the features of the claimed invention, Applicants respectfully submit that independent claims 1 and 12, and all the claims that depend therefrom, are allowable.

CONCLUSION

Applicants have made a complete response to the Office Action and submit that the stated grounds for rejection have been overcome or rendered moot. Accordingly, all pending claims are allowable and the application is in condition for allowance.

If it would expedite prosecution, the Examiner is invited to contact Applicants' undersigned representative at the number below.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,

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Date: June 16, 2008

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